

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

NATIONAL RIFLE ASSOCIATION OF
AMERICA,

Plaintiff/Counter-Defendant,

v.

LOCKTON AFFINITY SERIES OF
LOCKTON AFFINITY, LLC, and
KANSAS CITY SERIES OF LOCKTON
COMPANIES, LLC,

Defendants/Counter-Plaintiffs.

Civil Action No.: 1:18-cv-00639-LO-JFA

**JOINT MOTION FOR ENTRY OF
STIPULATION AND [PROPOSED] PROTECTIVE ORDER**

Plaintiff/Counter-Defendant National Rifle Association of America and Defendants/Counter-Plaintiffs Lockton Affinity Series of Lockton Affinity, LLC and Kansas City Series of Lockton Companies, LLC (each a “Party,” and collectively, the “Parties”), by their respective undersigned counsel, respectfully move this Court, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, for entry of the attached Joint Stipulation and [Proposed] Protective Order limiting the use and disposition of certain information and documents. Discovery in this action may yield documents and information of a sensitive and confidential nature. As a result, the Parties have agreed to the attached Joint Stipulation and [Proposed] Protective Order.

The parties agree to submit this Joint Motion to the Court without oral argument pursuant to Local Rule 7(E).

Dated: September 7, 2018

Respectfully submitted,

NATIONAL RIFLE ASSOCIATION OF
AMERICA

By: /s/ Robert H. Cox

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*Counsel for Plaintiff/Counter-Defendant
National Rifle Association of America*

Respectfully submitted,

LOCKTON AFFINITY SERIES OF
LOCKTON AFFINITY, LLC, and
KANSAS CITY SERIES OF
LOCKTON COMPANIES, LLC

By: /s/ Timothy J. McEvoy

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CERTIFICATE OF SERVICE

I certify that on September 7, 2018, I electronically filed the foregoing Joint Motion for Entry of Stipulation and [Proposed] Protective Order, memorandum in support thereof, and Stipulation and [Proposed] Protective Order with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record, including:

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